FEDERAL COMMUNICATIONS COMMISSION 445 12th STREET SW WASHINGTON DC 20554

MEDIA BUREAU AUDIO DIVISION APPLICATION STATUS: (202) 418-2730 HOME PAGE: www.fcc.gov/mb/audio/ PROCESSING ENGINEER: Edward Lubetzky TELEPHONE: (202) 418-2700 FACSIMILE: (202) 418-1410/11 MAIL STOP: 1800B2-EAL INTERNET ADDRESS: Edward.Lubetzky@fcc.gov

October 19, 2011

John S. Neely, Esq. Miller and Neely, P.C. Suite 704 6900 Wisconsin Avenue Bethesda, MD 20815

> Re: Kimtron, Inc. WRDT(AM), Monroe, MI Facility ID Number: 25083 File Number: BMML-20110811ACK

Dear Counsel:

This is in reference to the above-captioned application for license based on moment method modeling.

A preliminary engineering study of the application reveals the following deficiencies:

- 1. The normalized current moment sums for each tower do not equal the authorized theoretical parameters, as Section 73.151(c)(2)(i) requires. Specifically, the current moment sums shown on page 23 of the engineering exhibit show different values for towers 1 and 4, whereas the field ratios for these towers are equal.
- 2. The fourth tower is 89.9° away from tower one but a spacing of 90° is used in the modeling.
- 3. The frequency used to measure the impedance of sampling lines with the sample current transformers attached was not provided.

Further action on the subject application will be withheld for thirty days from the date of this letter to provide the applicant an opportunity to file a curative amendment. Failure to respond or file a curative amendment within this time period will result in the dismissal of the application pursuant to Section 73.3568 of the rules.

Sincerely,

n llag

Ann Gallagher Audio Division Media Bureau

cc: Kimtron, Inc. W.C. Alexander